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February 24, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 05-82 – Petition of Dig Safe System, Inc.

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find an original and nine (9) copies of Verizon Massachusetts' Petition to Intervene and Appearance of Counsel.

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Barbara Anne Sousa".

Barbara Anne Sousa

Enclosures (9)

cc: Tina W. Chin, Hearing Officer
Michael Isenberg, Director – Telecommunications Division

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Docket No. 05-82

Pursuant to 220 C.M.R.1.03(1) of the Rules of Practice and Procedure of the Department of Telecommunications and Energy (“Department”), Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”), hereby petitions the Department for leave to intervene as a party in this proceeding. As grounds for its Petition, Verizon MA states as follows:

2. In its *Order to Open an Investigation*, issued on February 10, 2006, the Department opened this investigation to address the petition filed by Dig Safe Systems, Inc (“Dig Safe”) to implement “811” as the abbreviated dialing code for providing notification of excavation activities to underground facility operators within Massachusetts. The 811 code was designated by the Federal Communications Commission (“FCC”) in its March 14, 2005, Order, as the national abbreviated dialing code to be used exclusively by a state’s “one call” notification system and deployed ubiquitously by all carriers through the United States that provide access to state One Call Centers. *In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements*, 20 F.C.C.R. 5539, ¶¶ 1-2, 4 (2005). The Department established this

investigation to examine the "technical and operational issues" associated with implementing the 811 code for this purpose.

3. Since this investigation will address the implementation of the 811 code by telecommunication carriers in Massachusetts, Verizon MA is substantially and specifically affected by the proceeding. Verizon MA's interests cannot be adequately represented without the Department granting this petition.

4. Verizon MA intends to participate fully in the case and will, as necessary, submit written comments, present testimony, conduct discovery, cross-examine witness, and/or file briefs to protect its interests.

5. All correspondence and other communications regarding this proceeding should be served on Verizon counsel and the following:


Ellen Cummings, Specialist
Verizon
125 High Street, 7th Floor
Boston, MA 02110
e-mail: ellen.cummings@verizon.com

WHEREFORE, Verizon MA requests leave to intervene in the proceeding with all the rights of participation as a full party.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorneys,


Alexander W. Moore
Barbara Anne Sousa
185 Franklin Street, 13th Floor
Boston, Massachusetts 02110-1585
(617) 743-7331

Dated: February 24, 2006

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Dig Safe Systems, Inc. for Implementation of
811 as the Abbreviated Dialing Code for Providing
Notification of Excavation Activities to Underground
Facility Operators Within Massachusetts

Docket No. 05-82

APPEARANCE OF COUNSEL

In the above-captioned proceeding, the undersigned hereby appears for and on behalf of Verizon Massachusetts.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,



Barbara Anne Sousa
185 Franklin Street, 13th Floor
Boston, Massachusetts 02110-1585
(617) 743-7331

Dated: February 24, 2006